

EXHIBIT 2

← **Post**



Mrs. Detective Pikajew, Esq.

@clapifyoulikeme

I need all of [#lawtwitter](#) to read this complaint. I promise you will not regret it. drive.google.com/file/d/1OkV-Wk...

In the United States District Court, of the Southern District of New York.

Gideon Rapaport, Plaintiff,

v.

John Doe #1, a Reddit.com user, John Doe #2, A Top-Law-Schools.com user, John Doe #3 a current or former NYU Law student, Individually, Defendants.

No. 23-cv-_____ - _____
July 28, 2023.

Gideon Rapaport, pro se,
45 River Drive S #2308, Jersey City NJ, 07310
GideonRapaportLaw@outlook.com
(862) 213-0895

Complaint and Jury Demand

Plaintiff Gideon Rapaport ("Plaintiff"), pro se, complains and states as follows as to all matters:

THE PARTIES

1. Plaintiff is a former employee of Kirkland & Ellis LLP and a graduate of the New York University School of Law. He is a nonresident alien lawfully admitted to the United States.
2. Defendant Does 1 through 3, upon information and belief, are former or current employees of Kirkland & Ellis LLP.

5:03 PM · Aug 6, 2023 · **299.7K** Views



60



246



768



376



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Lesbian consultant. Cats (2019) fancier. Banned in Britain. A good argument, just miles outside the scope. She/her. Same @ everywhere.

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The UK

927K posts

Politics · Trending

Iran

619K posts

Politics · Trending

#UKRiots

43.4K posts

Smh why wouldn't you include screenshots, I wanna see the fake "wanted" or 'public enemy' poster"

A. Forged Document Fabricated And False Claims Are Disseminated Via Anonymous Internet Posts

6. On or about July 30, 2022, defendant Does 1 through 3 conspired to and did perpetrate a libelous internet hoax and character assassination against the Plaintiff accompanied by a word-of-mouth slander campaign. These posts were made on Reddit.com and Top-Law-Schools.com.

7. Defendants forged a document by affixing to it, without proper authorization or permission to so and outside of the scope of their employment, the name of their employer, Kirkland & Ellis LLP, which had employed Plaintiff at the same time as Defendants. This document was in the style of a "wanted" or "public enemy" poster as would be produced by law enforcement and consisted of the aforementioned name, a corporate headshot style photograph of the Plaintiff obtained from an internal website created by the employer to facilitate social interaction among employees, and the bolded and capitalized text **"DO NOT ADMIT"**.

8. A photograph of this forged document was presented as evidence in support of the false claims made in the accompanying libelous posts, which centered on the false and baseless assertion that the Plaintiff was fired for sexual harassment and misconduct.

9. In being so presented as evidence for the false claim, the photograph of the forged document was falsely asserted to have been taken at the guarded security gate at 601 Lexington Avenue, New York when in fact it was staged in a cubicle of the kind that was assigned to summer associates at that address, as is plainly visible from the background captured around the forged document.



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Oh apparently it's all "" now...discovery should be interesting!

And False Claims Are Disproven By Firm Director of

rd 2022, Lee Otis, the director of the James Kent Sur
attend that same day, spoke via telephone with Steven
Kirkland & Ellis LLP to ascertain the veracity of th
y the forged document.

conversation, Mr. Goldblatt declared to Mrs. Otis that
any allegation or complaint of sexual harassment or m
e aware of no such wrongful conduct by the Plaintiff.

erted in that call that he and his department could locat
document described in 7 *infra* being created or issued
ent like that, that the forged document was not curren
had no knowledge of that document was ever displayed

ent proof to Mrs. Otis that the claims made by the an
horization of Plaintiff to participate in the program late

r about August 6th, after fail
my, the initial anonymous i
ted or edited to remove all
ms that do not allow users t

tiff spoke via phone with Ste
During that conversation M
-12 *infra*.



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27K





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God willing this goes to trial and the menswear guy ends up as an expert witness

C. Anonymous Internet Posts Contain Obsessive Discussion Of Skewed Personal Details Irrelevant To Defamatory False Claims

16. Although the anonymous internet posts centered on the false assertion that the Plaintiff was fired for sexual harassment and misconduct, the posts, digressed wildly into describing the purported personal opinions of the Plaintiff as to the correctness of judicial opinions published by the United States Supreme Court during the summer of 2022, his habit of dressing relatively formally in the workplace by wearing at least a two piece suit and a necktie every work day, his stylistic choices in menswear with a particular fixation on his occasional wearing of button suspenders, his rumored enthusiasm to participate in class discussions at law school, his extracurricular activities at law school, his general political views, his invitations as a formal escort in the debutante ball circuit of New York City, his acceptance into exclusive social circles and private social clubs in Manhattan, and baseless speculation about his family life and circumstances.



8



18



294



29K





"To be clear, I was excited about women's rights being stripped, but I was way more excited about getting to play with guns"

18. The focus of the anonymous internet posts on the personal opinions about the law and political views alleged to be held by Plaintiff also indicate an ideological or political motive for the attempt at character assassination, specifically revolving around the opinion of the United States Supreme Court in *Dobbs v. Jackson Women's Health Organization* which Plaintiff was alleged to have celebrated.

19. Although Plaintiff believed that *Dobbs v. Jackson Women's Health Organization* was correctly decided, he did not celebrate it on or after June 24, 2022 in the workplace, as was incorrectly alleged and emphasized in the anonymous internet posts, for multiple reasons. Plaintiff already believed in the veracity of credible rumors he personally received in early February, 2022 that the opinion would turn out as it eventually did, and the widely reported leak of May 2, 2022 greatly supported that conclusion. Furthermore, Plaintiff was not particularly interested in the *Dobbs* case and was still celebrating the *New York State Rifle & Pistol Association, Inc. v. Bruen* opinion that was published the day prior. It was also at this time that upon his reflection on the effective removal during the day prior of Paul Clement and Erin Murphy from the firm, the two partners who had successfully litigated the *Bruen* case, who were personally known to Plaintiff alongside some of the partners that orchestrated their effective removal, upon information and belief, in breach of contract and assurances made to Clement and Murphy upon

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their joining the firm that they would be free to litigate cases at the Supreme Court of the United States on a side that some may find controversial (presumably due to the necessity of having at least two sides to every case or controversy in the adversarial system, it would be almost impossible to litigate any matter without someone finding the position of one side controversial, if this principle were uniformly applied which Plaintiff does not believe that it was or is), Plaintiff decided that he would not want to continue his association with the firm after graduating law school.



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That's a hell of a claim to include in a federal filing upon information and belief

D. Motive and Timing Of Forged Document And Defamatory Anonymous Internet Posts

20. Upon information and belief, Defendants solicited multiple women summer associates to file false complaints of sexual harassment or misconduct against Plaintiff but could not find one willing to do so. This necessitated that the character assassination rely on the creation of the forged document to obtain credibility beyond a mere anonymous internet post.

21. Upon information and belief, Defendants timed the publication and forwarding of the anonymous internet posts very closely to the start of the James Kent Summer Academy in order to prevent the Plaintiff's attendance at the latest possible time so as to deny him the opportunity to marshal sufficient facts to prove the falsehood of the hoax, and thereby cause him direct and specific injury.

22. Selection for the James Kent Summer Academy was listed in the Plaintiff's resume that was provided to fellow employees by employer, and a public web page provided the dates of the program for 2022.



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21K





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Uh ok

Beyond the severe but diffuse harms arising from the forged document 7-9 *infra*, anonymous internet posts 16-18 *infra*, subsequent false complaint made to remove him from law school 23-25 *infra*, ongoing oral slander campaign 30 *infra* Plaintiff suffered particular harm to his valued relationship with Professor Richard A. Epstein, of New York University and the University of Chicago.

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21K





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35. Plaintiff had first encountered the lectures and works of Professor Epstein in the field of law and economics on or about May, 2009 due to his childhood interest in economics. These lectures and works encouraged in Plaintiff an interest in law generally, the American system of government, Roman law and the common law of the 18<sup>th</sup> to late 19<sup>th</sup> centuries. It was at this time that Plaintiff set the personal goal of gaining admission to the University of Chicago Law School where Professor Epstein was tenured at the time. From that time until the present, Plaintiff has revered Professor Epstein above all other living academics or intellectuals due to his brilliant mind, extraordinary intellectual breadth, consistent commitment to first principles, comprehensive legal theory and kindness.

36. On or about May 2013, Plaintiff obtained special permission in his jurisdiction to study economics at the University of British Columbia prior to completing high school, with a professor who was also a lawyer and incorporated law and economics into his courses. After completing high school, Plaintiff went on to obtain special permission, on or about December, 2014, to take the upper-level course of Roman Law during his first full year as an undergraduate business student.

37. After beginning his studies at the New York University School of Law, Plaintiff met Professor Epstein for the first time on or about September 10, 2019. The appreciation of Plaintiff for the Professor would be increasingly reciprocated over the course of the years as Plaintiff took Constitutional Law from Professor Epstein and maintained a consistent interest in his lunch debates, academic works and events. The opportunity to meet, discuss the law with and take courses from Professor Epstein represented the successful achievement of a major life aspiration for Plaintiff.

38. Upon information and belief, Professor Epstein taught Property in the Fall 2022 Term in addition to the light three credit course he had initially planned to limit himself to for personal health reasons which were eventually fully resolved, in order to entice Plaintiff to not go through with his plan to study abroad and/or at a different American law school for the 2022/2023 academic year due to the environment at the law school, which Plaintiff had shared with him in writing on or about April 13, 2022.

39. In early May 2022, Professor Epstein called Plaintiff and notified him that he would be teaching Property in the fall in addition to the previously scheduled course, that he wanted Plaintiff to take both courses from him, and that he wanted Plaintiff to serve in the capacity of Senior Article Editor on the law journal for which he is the faculty adviser, the New York University Journal of Law and Liberty, to which the Plaintiff had not applied. Plaintiff was deeply moved by these gestures, and for fear of disappointing Professor Epstein, who at the time was suffering from health issues from which he eventually fully recovered, abandoned his plans to spend that academic year abroad and/or visiting elsewhere, and assumed the risk of remaining where he was threatened.



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Ah yes noted bastion of antisemitism \*checks notes\* New York University

40. Plaintiff initially planned to spend this final year of law school abroad as an exchange student, and/or a visiting student at a different law school in the United States (while still graduating from New York University) on account of an air of persecution and threats personally directed towards Plaintiff. These targeted threats were made against a background of rampant and unpunished anti-Semitism at the law school, including public and widely reported on calls for the destruction of the State of Israel, which is the country of birth of the Plaintiff, and murder of the Jewish citizens that live within it, which would include close relatives of the Plaintiff. These widely reported on public calls for the destruction of Israel

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and the murder of Jews were accompanied by public threats to students who would disagree with the antagonists or complain.

41. These public calls for genocide and threats against students at the law school who would express disagreement or complain brought no punishment for the antagonists, but did result in the shutting down of the email list-serv sponsored by the law school on or about August, 2022. Upon information and belief, the list-serv was shut down due to concerns that continued publication of anti-Semitic calls to genocide and threats against particular Jewish students in a school-sponsored forum, which the school was for some reason unwilling to punish, would clearly violate the consent order entered into on or about, September 30, 2020, which the university had entered into to settle a lawsuit brought by the federal government under Title VI of the 1964 Civil Rights Act alleging failure to punish racially and religiously motivated abuse of Jewish students.



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19K





## Imagine being scared of a bunch of law students

42. Plaintiff was already warned, and sincerely believed in early May 2022 when he spoke with Professor Epstein, that something terrible would happen to him if would return to New York University in the 2022/2023 academic year, and that he would also be in danger during his period of summer employment in New York City prior to the start of that academic year. Plaintiff accepted this danger, which he believed carried a serious risk of preventing him from completing his legal education, because Professor Epstein had requested his presence at the law school that upcoming year, and he believed that shirking his duty to Professor Epstein and the law school in the face of danger would be a moral failure, especially considering the valuable opportunity he had received to study under Professor Epstein at the New York University School of Law, which is reputed to be an elite law school, and that he strove for that opportunity for approximately half of his life. Plaintiff understood that beyond his help as a loyal staff member on his law journal and a student, Professor Epstein also wanted his contribution as an informal teaching assistant to help him with the full and mandatory Property class he had undertaken to teach.

43. Having chosen this course of action, Plaintiff resolved to personally suffer the consequences of any harm that would come his way, and that if he were somehow prevented from completing his legal education, as Defendants would eventually unsuccessfully attempt as described in 23-25 *infra*, he would join the bar without a law degree after office study pursuant to Rule 520.4 of the Court of Appeals of New York. At this time, Plaintiff believed, as a matter of personal faith, that events would transpire beyond his control, that the execution of the threats already made against him would lead him to his destiny, that it would be a good destiny if he remained fearless and maintained faith, and that through the adversity which was in store for him he would obtain a clearer understanding of the truth of life and this world.

44. The early concerns about the air of persecution and threats directed towards Plaintiff described in 38-43 *infra* unfortunately proved to be well-founded, as seen in the causes of action arising from the forged document 7-9 *infra*, anonymous internet posts 16-18 *infra*, subsequent false complaint made to remove him from law school 23-25 *infra* and ongoing oral slander campaign 30 *infra*.



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What? What? WHAT?

46. Following Plaintiff's first year of law school, Professor Epstein repeatedly offered and promised to help Plaintiff obtain a federal clerkship, assured him that he was eminently qualified and that best efforts would be made even for the most difficult "feeder" clerkships. During one such conversation on this topic, on or about late January, 2022, Plaintiff shared that beyond the moral satisfaction of public service and associated professional prestige, he also desired the valuable experience and intellectual development because it could be used by him at some distant date in service of the law and the public from the bench. Professor Epstein told Plaintiff that he has sufficient talent and intellectual breadth to one day serve as a strong federal appellate judge if he would be willing to suffer a significant decrease in income and the abusive confirmation process. Plaintiff responded that he was not particularly materialistic so as to be concerned with the predicted sacrifice of income and was already used to extraordinary public abuse at law school. Plaintiff then lamented to Professor Epstein, that on account of the time of his birth, he could not have the opportunity to be publicly attacked and moralized to on the subject of women's rights by a drunk who drowned a woman by driving his car off a bridge and continued his next day as if nothing happened and integrity by "Senator Joe '10% for the Big Guy' Bribem", as Justice Thomas was in October, 1991. Professor Epstein assured Plaintiff that his generation and the generation immediately preceding it would also produce miscreant politicians capable of creating similar irony.





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I would pay cash money for a livestream of Epstein as he reads this

publication of the defamatory materials and filing of false claims, and on or about an exceptionally one-sided phone call, during which Plaintiff hardly spoke and during or disagreement, Professor Epstein declared to Plaintiff that he had decided the recent "shipwreck", and despite the forgery and falsity of the allegations, that Plaintiff's federal clerkship, will not serve as Senior Article Editor of the Journal of Law and will limit his association with Plaintiff because of his "touris" (which means "tourism" at Plaintiff is a tax upon people who associate with him, and that if he has any contact with a psychiatrist to complain to if he does not have one already. Perhaps as a planned measure, Professor Epstein then continued to inform Plaintiff that although his vision statement Fellowship was the best he had ever read, had the piercing insight and sweeping exemplifies the Plaintiff's abilities and was more than what could be expected of a member of a faculty on tenure track at a good law school, he believed that it was not his association with the Plaintiff, even considering the forgery and the false allegations and that the motive for the defamation was the holding of the Plaintiff

Plaintiff found humor in the dry, awkwardly paced and overly serious tone of Epstein, enjoyed hearing him make use of his limited Yiddish Brooklyn accent, saw the amusing irony in referring to a law professor as a "tourist", and wondered if such one-sided monologues were similar to the stories about how Justice Douglas would calmly inform him of his location to Goose Prairie, Washington State, or rural Oregon, and be lost in the wilderness.

Plaintiff believed that the sudden change in his treatment by Professor Epstein was a measure in case of further publicity, and a teaching moment for Plaintiff, a reaction to the controversy raised thus far. Although Professor Epstein's views about ideas and hold intellectual positions that are radical in the legal community, he is highly averse to interpersonal conflict and controversy.

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values as championed by the fellowship. The monetary value of the fellowship was a value in prestige. Professor Epstein concluded by telling Plaintiff that he was the best he had ever met and it is unclear if this meant as a compliment.

Plaintiff did not want to believe that Professor Epstein would throw him under the bus to be false and based on a forged document, and which could be seen as the clear motive for the tortious behavior of Defendants with the information and belief, a major part of the reason for why Plaintiff's sharing values and associating himself with Professor Epstein in June 2022, a lunch with fellow employees who were keen to discuss the academic work they had each encountered in multiple courses during



9



12



225



34K







Tfw you can't decide if you hate Epstein for his betrayal or if you love Epstein for his strong stance against the administrative state

54. After waiting for and encouraging any showing to the contrary by Professor Epstein for approximately one month, Plaintiff became forced to accept that he had been betrayed and kicked while already down by someone he had revered for so long and who had been such a profound teacher, causing immense emotional distress far in excess of the broad effects of the other wrongs committed against Plaintiff by Defendants. On or about September 28<sup>th</sup> 2022, Plaintiff raised the issue with Professor Epstein in his office at the New York University School of Law and it became clear to Plaintiff that Professor Epstein would not admit to any wrongdoing or mistake in this matter. Plaintiff then told Professor Epstein that even if he will teach for many years to come he will not have another student like the Plaintiff, that because of his moral failure he does not deserve to have Plaintiff as a student, and that he betrayed his most devoted and innocent student to protect the image of his own legacy in a manner that would probably backfire.

55. Upon hearing this, Professor Epstein became extremely agitated, and uncharacteristically screamed at the Plaintiff to get out of his office. As Plaintiff was leaving Professor Epstein told Plaintiff that he has no idea what betrayal is and was shameless, to which the Plaintiff responded that on account of the age and health of Professor Epstein, Plaintiff had been very restrained in waiting approximately one month for him to do the right thing on his own while being provided with ample opportunities to do so, especially in light of how he is the author of a Torts casebook that covers defamation. This was the first and only time that Plaintiff ever heard Professor Epstein scream in anger.

56. Subsequently, Plaintiff would avoid and hardly ever speak to Professor Epstein except in unavoidable circumstances when a simple greeting was expected such when meeting in close proximity at a speaker event. Professor Epstein would occasionally glare at Plaintiff with an uncharacteristic, piercing look of intense hate, such as when Plaintiff was seated roughly across from Professor Epstein at a speaker event on or about November 17, 2022 at the law school. Plaintiff noticed this glare from the corner of his eye and was deeply unsettled to see it linger for several seconds even after he had turned to look directly at Professor Epstein. Plaintiff received further long and unsettling glare a few other times at speaker events also attended by the professor, when he was engaged in positive social interactions with other people while ignoring Professor Epstein for the duration of a particular event.

57. Had Plaintiff received such hateful and intense glares from a younger man he may have feared imminent physical attack, and if from a man capable of or inclined to malice, which Plaintiff believes that Professor Epstein is not, he may have feared a vendetta of some kind. Plaintiff had never seen Professor Epstein look at anyone else with such hate, although he did come approximately halfway in the case of a speaker who was defending the morality and constitutionality of the contemporary federal administrative state.



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There's no way this happened but if it did happen I don't know how plaintiff didn't dissolve into a puddle on the floor

58. The next time that Plaintiff communicated with Professor Epstein, well after the conclusion of the fall term, on or about February 3, 2023, was to wish him in writing a good outcome on a major surgery he was about to undergo, and did not receive a response. Plaintiff next saw and briefly spoke with Professor Epstein at the Journal of Law and Liberty Symposium on February 8, 2023 in order to express support for him before his imminent surgery. During the dinner hosted after the symposium, Plaintiff

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was seated in a table adjacent to that of Professor Epstein, and upon the return of Professor Epstein from the speaking platform at the front of the room, noticed that his chair, which was of a folding type that did not provide support unless it was fully locked open, was not so locked open, apparently since when he rose from his seat previously to speak. Plaintiff then locked open the chair for Professor Epstein, who had not noticed this, in order to avert his injury. Professor Epstein then loudly announced in the presence of approximately twenty students affiliated with the journal, several distinguished law professors from New York University and elsewhere, and two federal court of appeals judges, that that was all Plaintiff was good for. At the conclusion of the dinner, guests either left the group or moved together to socialize at a nearby bar which had a floor reserved for the symposium crowd. Plaintiff was joining the group heading to the bar when he saw Professor Epstein alone in the hallway of the law school, and asked him if he was going to join the group, and Professor Epstein responded that he was going home. Plaintiff then offered to walk with him to the subway on account of it being very late, and then set out with him. There was a feeling that it was time to let bygones be bygones, especially considering the imminent surgery and that Plaintiff would be completing law school in a few months, and the past was not spoken of.



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16K





"Although still being ignored on the matter of the Property exam at that time," has to be the funniest opening to a paragraph in a federal court filing ever

59. Subsequently, Plaintiff would attempt to review his Property exam with Professor Epstein for four months and would continuously be ignored in this matter after repeatedly attempting to contact both of Professor Epstein's assistants and him personally regarding the exam. Eventually the request was partially granted when Plaintiff was given the raw text of his submission without any grading markings and a few top-scoring exams to compare with.

60. Plaintiff believes that his numbered exam was identified by his distinctive writing style and frequent citations of Professor Epstein's own works and theories and marked down far beneath the grade deserved. Plaintiff has read Professor Epstein's major works cover to cover as well as every Supreme Court or appellate brief signed by Professor Epstein that is in the public record. Upon information and belief, Professor Epstein often bases exam questions on cases he has litigated himself or filed amicus briefs for both intentionally in some cases and unconsciously in others. Plaintiff developed the ability to resolve these questions by relating the law generally and the legal briefs of Professor Epstein to his more theoretical writings in books and law review articles on the same topics, while providing Plaintiff's own analysis and critiques of the law and scholarship of Professor Epstein as original contributions derived from his contemplation of the former materials.

61. Although still being ignored on the matter of the Property exam at that time, Plaintiff wished in writing for Professor Epstein to have a happy birthday on or about April 10, 2023, and was pleased to subsequently be invited to the celebration of his 80<sup>th</sup> at the Yale Club of Manhattan on or about April 13, 2023, organized as a conference on classical liberalism with ten speakers on two panels and designated speaking slots after each panel for Professor Epstein to comment on the panels. There was no hostility or glaring during the combined birthday party and law conference.





Notice me senpai

62. The events which transpired as described in 48-61 *infra* have led to significant emotional distress and suffering for the Plaintiff including by causing him to have deep concerns that even if he were able to someday have an academic career fractionally as successful as Professor Epstein or otherwise rise significantly in the world, that something, perhaps a selfish concern with prestige, legacy accumulating after tenure or material comfort, would cause him to have an equivalent moral failure of betraying a

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loyal and innocent student such as Plaintiff. Plaintiff believes that when much is given, much is required, and witnessing such an action by someone so revered turned his understanding of the moral order of the world upside down.

63. Plaintiff lives according to and is motivated by moral code which could be described as stoic and he places honesty, integrity and loyalty in the pursuit for greater justice according to natural law above material reward or punishment, and due to these convictions, suffered severe emotional distress from witnessing Professor Epstein, an otherwise moral and exemplary man who benefits from tenure and great wealth suffer such a profound moral failure, resulting from the machinations of Defendants in this matter, "rise above principle", a phrase he often uses, to betray and kick a man who was already down.

64. Plaintiff also suffered severe emotional distress on account of the events which transpired described in 48-61 *infra* leading to a crisis of faith and cultural identity for Plaintiff. Specifically, this occurred due to the shock experienced in witnessing Professor Epstein, a Jewish man born during the Holocaust, who upon information and belief overcame anti-Semitic quotas, was fortunate enough to attend the finest universities in the world such as Columbia, Oxford and Yale and was invited to join the legal academy immediately after law school, discard, betray and denigrate a young man who was so devoted to him and who he knew to be innocent as described in 48 *infra*.



I would also like seven million dollars

#### COUNT IV

##### INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

94. Plaintiff realleges and incorporates by reference the allegations set forth above as if fully set forth herein.

95. Defendants knowingly and intentionally orchestrated the events as described herein to cause plaintiff emotional distress in a manner that would shock the reasonable person and the public.

##### PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in favor of Plaintiff and against Defendants and award the following relief to Plaintiff:

A. Presumed, actual, special and/or compensatory damages of seven million dollars for economic loss and an amount to be proven at trial for non-economic losses and harms;

B. Punitive damages;

C. The costs, disbursements and expenses of this action;

D. Pre- and post-judgment interest on the sum of any presumed, actual, special or compensatory damages; and

E. Such other relief as the Court may deem just and proper.

##### JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff Gideon Rapaport, demands trial by jury in this action of all issues so triable.



I would also like seven million dollars

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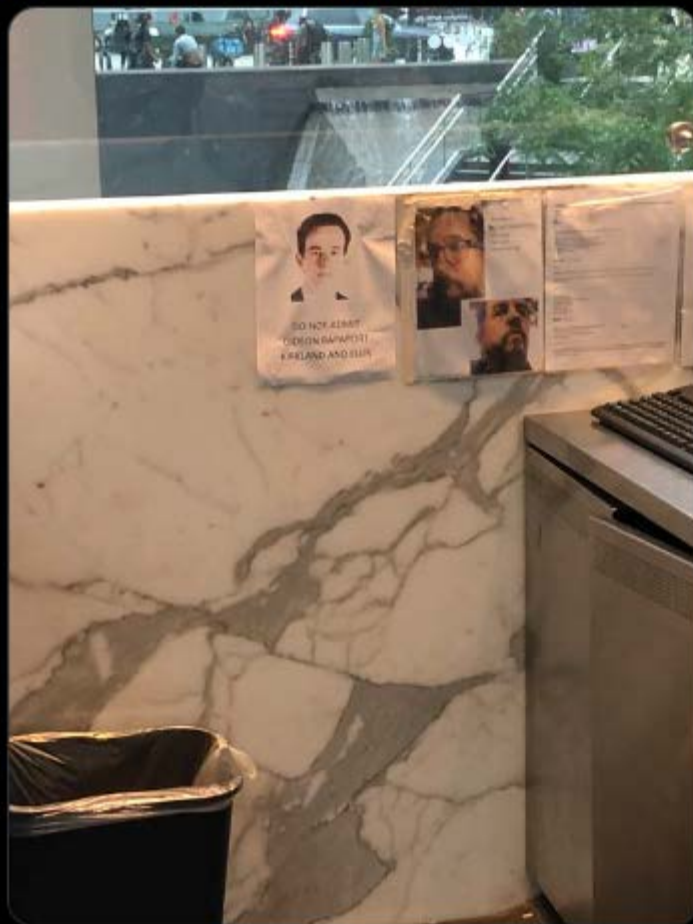


**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 6, 2023

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We got it lads, s/o to an anonymous tipster



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 6, 2023

Replying to @clapifyoulikeme

Smh why wouldn't you include screenshots, I wanna see the fake "'wanted' or 'public enemy' poster"



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Why are you talking like Sephiroth in the Court's mentions

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The Honorable Jessica G. L. Clarke  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Rapaport v. Does 1-3*, 23-CV-06709  
Motion for Extension of Time to Serve

Your Honor:

I am writing to respectfully request a 90 day extension to the time provided for effectuating service of process upon the defendants in this case.

The defendant tortfeasors have continued to hide behind the veil of anonymity making the service of process in this case exceptionally difficult.

Although I have uncovered much information relevant to the matter at hand as the result of diligent investigation, I have not yet succeeded to obtain the requisite information to effectuate service of process on the defendants. I am highly confident that given the extension requested, I will have sufficient time to effectuate service.

Thank you for considering my request in this matter,

Respectfully submitted,

/s/ Gideon Rapaport



Ok no worries we'll check back in January

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## MEMO ENDORSED

The Honorable Jessica G. L. Clarke  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Rapaport v. Does 1-3*, 23-CV-06709  
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Your Honor:

I am writing to respectfully request a 90 day extension to the time provided for effectuating service of process upon the defendants in this case.

The defendant tortfeasors have continued to hide behind the veil of anonymity making the service of process in this case exceptionally difficult.

Although I have uncovered much information relevant to the matter at hand as the result of diligent investigation, I have not yet succeeded to obtain the requisite information to effectuate service of process on the defendants. I am highly confident that given the extension requested, I will have sufficient time to effectuate service.

Thank you for considering my request in this matter,

Respectfully submitted,

/s/ Gideon Rapaport

Application GRANTED. The deadline to effectuate service is EXTENDED to **January 24, 2024**. The initial pretrial conference is RESCHEDULED to **February 15, 2024 at 11:00 a.m.**

SO ORDERED.



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1.4K







Lmaooooo I hope the court issues these subpoenas and the FedSoc ghoul's have to defend against a monster of their own making  
[storage.courtlistener.com/recap/gov.usco...](https://storage.courtlistener.com/recap/gov.usco...)

Re: *Response, Docs 1-2, 23-CV-08708*

**Motion for Leave to Serve Third-Party Subpoenas Prior to a Rule 35(a) Conference**

Your Honor:

I am writing to request an order to expedite discovery in this case for the limited purpose of obtaining information that will enable me to effectuate service upon Defendants. Specifically, I am requesting authorization for a third-party subpoena of testimonials and their intent to be served upon each of the persons or entities identified below.

• Mr. Steven Goldstein, Director of Human Resources of Kirkland & Ellis LLP in New York

• Mr. John W. Sullivan, Senior Vice President and Chief Executive Officer of The Federation

Identify the Defendants by name and address.

These attacks against me occurred in the context of employment at the law firm Kirkland & Ellis LLP, and were perpetrated at least in part on the physical premises subject to exclusive access controls and surveillance of that law firm. I am informed and believe that a thorough investigation undertaken by the firm for a variety of purposes into the various conduct of its law employees who are defendants in this case has uncovered significant evidence only accessible to and possessed by the firm, which alone or in combination with evidence I have uncovered in during the course of my investigation will identify at least one of the Defendants and enable me to effectuate service and proceed with this case in furtherance of justice.

Subsequent to the initial defamatory anonymous internet posts, in order to ensure maximum

investigation, I am seeking specific information and materials which either alone or in combination with the results of my investigation so far could identify and enable service upon Defendants.

## II. FACTS

I have been the victim of a vicious and pre-meditated campaign of defamation and invasion of privacy undertaken by the Doe defendants, who struck from behind the veil of anonymity, which has exposed me to professional, economic, educational and reputational harm in addition to pain and suffering. Defendants sought to achieve these malicious aims through the publication of anonymous internet posts, utilizing forged and staged materials presented as evidence, to falsely label me as a person who committed serious crimes and misconduct and expose me to scorn, ridicule and contempt before the world at large.

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### 3. There Are No Alternative Means to Uncover Defendant Identity

Due to the sophisticated techniques utilized by the Defendants in initially spreading their defamations on the internet utilizing one forum that allows posting without the creation of any user information and another site that allows for that user name and information to be rapidly deleted with the post itself remaining, the only available means to uncover their identity are through the physical component of the text which involved forging and staging a document at the physical premises of Kirkland & Ellis LLP, the interpersonal component of the oral slander campaign which partially took place in the context of their own workplace, and the later repackaging and forwarding of the initial defamatory materials to The Federation Society in order to cause spread harm in the form of a following.



Mrs. Detective Pigniew, Esq. @clarifyoulikeme · Dec 4, 2023

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Casually filing a motion that announces my former beloved professor is old and probably going to die soon [storage.courtlistener.com/recap/gov.usco...](https://storage.courtlistener.com/recap/gov.usco...)

The Honorable Justice G.L. Clarke  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Rapaport v. Doez*, 1:23-CV-06709

**Motion for Expedited Discovery to Perpetuate Testimony**

Your Honor:

I am writing to request authorization for a third-party subpoena ad testificandum and deors (toen to be served upon Mr. Richard Allen Epstein in order to perpetuate testimony and preserve evidence that is critical to ensure justice in this case.

I have separated this request from my other request filed today for expedited discovery prior to the conference of the parties as is usually required by Rule 26(d) of the Federal Rules of Civil Procedure because of differences in scope and justification. That other request is for expedited discovery that is limited in scope to information needed to identify the Doe defendants so that they can be served which would allow for the case to continue normally, and for the use of discovery to be conducted after the conference of the parties usually required by Rule 26(d). This request is also made as a motion to expedite discovery in this case, but is similar in its aim to the procedure of Rule 23, which contemplates deposition to perpetuate testimony that is at serious risk of becoming unavailable, even before a case is brought, regarding any matter cognizable to the Courts of the United States.

Discovery meant to facilitate service and is necessary in order to prevent a failure of justice when that testimony is critical to the case, as the testimony herein contemplated is, and may be in the interest of all parties including those absent. Mr. Epstein, currently employed as a professor at the New York University School of Law, is the only known or possible witness to a significant amount of the transactions and occurrences which will be presented to the jury and deliberated upon by them after trial. His testimony is vital in assessing, valuing and allocating the severe damages suffered by the Plaintiff in this case as described in the initial complaint, particularly in paragraph 48, and relating them to the defamatory harm caused by Defendants.

These include direct economic loss such as the denial of a funded fellowship controlled by Mr. Epstein, educational loss such as the removal of the Plaintiff from the position of Senior Article Editor at the New York University Journal of Law and Liberty, and the loss of Mr. Epstein's position as a professor and mentor, and is best situated to locate and produce documents such as his correspondence and written accounts of the Plaintiff both prior to and subsequent to the defamatory conduct of Defendants that are vital evidence for the jury to be able to effectively determine the facts of this case and the harm caused by defamation. Although most critical in providing evidence for the damages portion of the deliberation of the jury, which is usually the last element both to be argued at trial and deliberated upon by the jury, the testimony of Mr. Epstein as to the causation and chain of events wrought by the Defendants may be of great value to the jury in their search for the truth of this matter as well.

Thank you for considering my request in this matter.



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9



1.8K







Mrs. Detective Pikajew, Esq. @clarifyoulike - Apr 24

Case 1:24-cv-05942-JGLC

Document 1-2

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1. I cannot believe he got a lawyer

2. Do we think this guy, who was admitted to practice in 1978, knows about reddit

[storage.courtlistener.com/recap/gov.usco...](https://storage.courtlistener.com/recap/gov.usco...)

| UNITED STATES DISTRICT COURT<br>SOUTHERN DISTRICT OF NEW YORK                                                                                                                                                                                                                                                                                                                                                                                                                                              |                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| DEON RAPAPORT,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                           |
| Plaintiff,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Case No. 23-cv-06709-JGLC |
| vs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                           |
| Defendants.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                           |
| <p>HEN DOE #1, a Reddit.com user,<br/>HEN DOE #2, a Tap-Law-Schools.com user,<br/>HEN DOE #3 a current or former<br/>NYU Law student.</p>                                                                                                                                                                                                                                                                                                                                                                  |                           |
| <p><b>APPEARANCE OF COUNSEL</b></p> <p>I, the clerk of court and all parties of record:</p> <p>I am admitted to practice in this court, and I appear in this case as counsel for plaintiff</p> <p>Deon Rapaport.</p> <p>Filed: New York, New York<br/>April 24, 2024</p> <p><i>Richard A. Altman</i></p> <p>LAW OFFICE OF RICHARD A. ALTMAN<br/>Attorneys for Plaintiff<br/>150 East 16th Street, Suite 12B<br/>New York, NY 10022<br/>212.633.0123</p>                                                    |                           |
| <p><b>il Report as of 04/24/2024</b></p> <p><b>Number:</b> 1447168</p> <p><b>Attorney:</b> RICHARD ALLEN ALTMAN</p> <p><b>Address:</b> 150 E 56TH ST APT 12B<br/>NEW YORK, NY 10022-3634<br/>(New York County)</p> <p><b>Phone:</b> (212) 633-0123</p> <p><b>Date of Birth:</b> 03/13/1978</p> <p><b>Bar Admission Department:</b> 1st<br/>FORDHAM</p> <p><b>Status:</b> Attorney - Due to Register within 30</p> <p><b>Expiration:</b> Mar 2024</p> <p><b>History</b></p> <p><b>Public discipline</b></p> |                           |



5



7



8.5K





THIS IS NOT A DRILL. WE HAVE AN AMENDED COMPLAINT WITH  
NAMED DEFENDANTS  [storage.courtlistener.com/recap/gov.usco...](https://storage.courtlistener.com/recap/gov.usco...)

Defendants:

Plaintiff Gideon Rapaport, by his attorneys, Law Office of Richard A. Altman, for his First Amended Complaint, alleges as follows:

#### THE PARTIES

1. Plaintiff Gideon Rapaport is a former employee of the law firm of Kirkland & Ellis LLP, and a graduate of the New York University School of Law. He is a citizen of Canada, and was lawfully admitted to the United States at the time of the filing of the original complaint as a nonresident alien, and that is his current status as well.

2. Defendant Ajay Srinivasan Iyer is a former employee of Kirkland & Ellis LLP, and a graduate of the New York University School of Law, where he served as the President of the Federalist Society chapter for the academic year of 2021/2022. He is a resident of the City and State of New York and is a U.S. citizen.

3. Defendant Ajay Srinivasan Iyer is, on information and belief, presently a judicial law clerk for Justice Jay Mitchell of the Supreme Court of Alabama, and a member of the bar of the State of New York.

-2-

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4. Defendant Zachary George Garrett is a graduate of the New York University School of Law, where he served as the President of the Federalist Society chapter for the academic year of 2022/2023.

5. Defendant Garrett is, on information and belief, currently a judicial law clerk for Judge Carlos Bea of the U. S. Court of Appeals for the Ninth Circuit



Seems to me he'd have a stronger case if he actually sought admission to the bar and was denied, but frankly I'm delighted imagining these fedsoc ghouls having to deal with a frivolous lawsuit so whatever

### INTRODUCTION

12. The gravamen of this action is a series of actions by defendants Iyer and Garrett which consisted of the repeated making of vicious, false and career-ending defamatory statements and actions. The statements were of and concerning the plaintiff, and the actions were creating digitally manipulated images containing plaintiff's name and face, and false words about him.

13. Defendant Epstein is a defendant based upon his actions in supporting and repeating the defamatory statements of defendants Iyer and Garrett, and because of his actions in preventing plaintiff from commencing a promised—and definite—appellate clerkship, and possibly one with the U.S. Supreme Court.

14. As a direct result of these false and defamatory statements and actions, plaintiff has not yet sought admission to the New York bar, despite having passed the bar examination, due to his fear of the adverse effect of these statements upon the Committee on Character and Fitness. He brings this action to clear his name so that he can pursue his chosen career



Mrs. Detective Pikajew, Esq. @clarifyoulikeme · May 25  
HELP

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**FIFTH CLAIM**  
**(Civil Conspiracy)**





Mrs. Detective Pikajew, Esq. @clapinyoutikeme · May 25  
Putting all this in writing is actually lowkey crazy  
[storage.courtlistener.com/recap/gov.usco...](https://storage.courtlistener.com/recap/gov.usco...)

Tuesday, March 5, 2024 at 19:31:35 Eastern Standard Time

**Subject:** Re: Gideon Rapaport  
**Date:** Tuesday, August 2, 2022 at 3:24:29 PM Eastern Daylight Time  
**From:** Zach Garrett  
**To:** Peter Redpath, Kate Beer Alcantara  
**Attachments:** Security Desk Photo.jpeg, TopLawSchools Thread.pdf, Reddit LawSchool Thread.pdf

Hello Peter and Kate,

As I mentioned to you over the weekend, my understanding is that Gideon Rapaport was fired from his summer associate position at Kirkland & Ellis NY last week for sexually harassing a practice assistant or an attorney. Please see the attached forum threads ("TopLawSchools Thread" and "Reddit LawSchool Thread"), each of which are in reference to Gideon's behavior and firing. Here are hyperlinks to the [TopLawSchools thread](#) and to the [Reddit thread](#). While I cannot confirm the sexual harassment claim specifically, I do know that Gideon was fired and banned from entering the building. Please see the attached photo ("Security Desk Photo") taken by Ajay Iyer at Kirkland & Ellis's New York location at 601 Lexington Avenue on Thursday, June 28th, where Ajay worked with Gideon this summer.

After getting back from the conference, I spoke with Richard Epstein about this situation. He's understandably very upset by the news and feels that Lee Otis should be made aware, since Gideon is going to be participating in the James Kent Fellowship, for which Professor Epstein wrote Gideon a (complicated) letter of recommendation. I don't know Lee Otis, though, so I'm sharing with you two Professor Epstein's concerns. If you feel Lee Otis should know, could you please notify her? If not, I understand. I simply felt it would be more appropriate to come from one or both of you rather than myself.

If you'd like to discuss further, please let me know.

Thank you,  
**Zachary G. Garrett**  
J.D. Candidate | Class of 2023  
New York University School of Law





**Miguel de Unamuno** @unamuno1898 · Aug 6, 2023

This is an awful lot of words. Is this person practicing law or will he be?



2



14



5K



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 6, 2023

not at the moment!



1



17



4.7K



[Show replies](#)



**Derek Debus** @derek\_debus · Aug 7, 2023

For such a “top student” it’s pretty clear he barely passed his legal writing classes lol



1



57



4.7K



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 7, 2023

Tbf my legal writing class didn’t teach me shit about how to write a complaint



2



33



4.5K





**a large goose** @KRGoose · Aug 6, 2023

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Me for the first few pages: oh haha he's mad some people made fun of him at work and spread rumors about him on the internet.

Me when I hit the Dobbs stuff: wow so he's even more insufferable than I thought

Me when I hit the Epstein stuff: excuse me WHAT



3



5



220



8.1K



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 6, 2023



it is a Journey



3



73



7.2K







**alexandra j. roberts** @alexanham · Aug 5, 2023

THEE new york university school of law



2



71



7.6K



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 6, 2023

ohio energy



60



7K



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**Dan Fischer**



@FischermanDan · Aug 7, 2023

Oh my god my friend was interning at the same time as this dude and told me about him



4



76



5.9K



**Mrs. Detective Pikajew, Esq.**

@clapifyoulikeme · Aug 7, 2023



32



5.2K



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**Aurora C** @theaurorac · Aug 7, 2023

That is the third most, uh, pro se of all pro se filings I've ever read, behind only the two recent ones involving death threats against a judge.



2



48



4.7K



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 7, 2023



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7



4.5K





**Balloon** @live4five · Aug 7, 2023

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Do you happen to have the Reddit and TLA posts too? I can't find them anywhere lol



1.8K



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 7, 2023



Some of it is in the replies



1.7K





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**Adam Klein** @AdamTheLawyer · Aug 7, 2023  
Does your anonymous tipster know what this jack weasel is alleged to have done?



1



3



552



**Mrs. Detective Pikajew, Esq.** @clapifyoulikeme · Aug 7, 2023

ㄟ(ツ)ㄟ



3



527

